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Attorneys for Defendants
Michael S. Talkcott, Ciudad

*Michael S. Talbott, Cindy Talbott,
Larry Wilden und die Lern- und Me-*

Leroy Wilder, and the Leroy and Nancy Wilder Trust

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ATHENE ANNUITY AND LIFE INSURANCE
COMPANY,

Case No.: 2:16-cv-00160-GMN-PAL

Plaintiff,

VS.

MICHAEL S. TALBOTT; CINDY TALBOTT;
SCOTT KELLER AND KAREN KELLER, as
individuals; LEROY WILDER, both individually
and as trustee of the LEROY AND NANCY
WILDER TRUST; and the LEROY AND
NANCY WILDER TRUST,

Defendants.

STIPULATION AND ORDER TO SET ASIDE DEFAULT

Plaintiff Athene Annuity and Life Company, by and through its attorneys of record, Latham & Watkins LLP, and Defendants Michael S. Talbott, Cindy Talbott, Leroy Wilder, both individually and as trustee of the Leroy and Nancy Wilder Trust, and the Leroy and Nancy Wilder Trust, by and through their attorneys of record, Marquis Aurbach Coffing, hereby stipulate and agree to the following:

1. To set aside the default entered by Plaintiff on February 24, 2016 against Defendants Michael S. Talbott and Cindy Talbott and on February 25, 2016 against Defendants Leroy Wilder and the Leroy and Nancy Wilder Trust (collectively referred to hereinafter as the “Defendants”).

1 2. Defendants shall file their answers on or before March 21, 2016, and agree not to
2 seek any further extension with regard to the filing of their answers.

3 **IT IS SO STIPULATED AND AGREED.**

4 Dated this 14th day of March, 2016.

Dated this 14th day of March, 2016.

5 MARQUIS AURBACH COFFING

LATHAM & WATKINS LLP

6 By: /s/ Jason M. Gerber

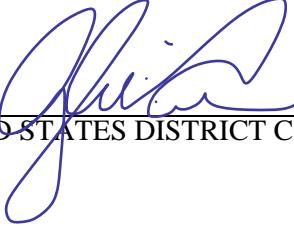
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13 *Attorneys for Defendants*
14 *Michael S. Talbott, Cindy Talbott,
15 Leroy Wilder, and the Leroy and Nancy
16 Wilder Trust*

By: /s/ Amy C. Quartarolo

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355 S. Grand Avenue
Los Angeles, CA, 90071-1560
Attorney for Plaintiff

13 **ORDER**

14 IT IS SO ORDERED this 15 day of March, 2016.

15 
16 _____
17 UNITED STATES DISTRICT COURT JUDGE

18 Submitted by:

19 MARQUIS AURBACH COFFING

20 By: /s/ Jason M. Gerber

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Leroy Wilder, and the Leroy and Nancy Wilder Trust*